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December 1, 2023

Donna Hocker Beyer
Judicial Assistant
United States District Court
Northern District of Texas
1100 Commerce Street, Room 1504
Dallas, Texas 75242-1003

Re: *SEVEN Networks, LLC v. Motorola Mobility LLC*, Case No. 3:21-cv-01036

Dear Ms. Beyer,

I write regarding Defendant Motorola Mobility LLC’s (“Motorola”) Motion to Compel SEVEN to Supplement its Responses to Motorola’s Interrogatory No. 6, filed as Dkt. No. 219. Pursuant to paragraph 4 of the Scheduling Order (Patent Pt. II), Dkt. No. 142, Motorola requests an expedited discovery hearing regarding the motion on Monday, December 11, 2023. Motorola seeks resolution of these discovery issues in advance of Motorola’s opening invalidity expert report, currently due January 12, 2024. The parties conducted a meaningful, substantive conference prior to Motorola’s filing of its motion to compel but were unable to reach a resolution.

Sincerely,

David J. Shaw
DESMARAIS LLP